

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

United States of America and States of the United States,
Ex rel. Patrick Donohue,

Plaintiffs,

– against –

CASE NO.: 1:20-CV-5396 (GHW-SDA)

RICHARD CARRANZA, in his official capacity as
the former Chancellor of New York City Department of
Education,

MEISHA PORTER, in her official capacity as the current
Chancellor of the New York City Department of Education,

**NEW YORK CITY DEPARTMENT OF EDUCATION,
NIAGARA FALLS PUBLIC SCHOOL DISTRICT,**

MARK LAURRIE, in his official capacity as Superintendent,
BUFFALO PUBLIC SCHOOL DISTRICT,

KRINER CASH, in his official capacity as Superintendent,
**MASSACHUSETTS DEPARTMENT OF EDUCATION,
SOMERVILLE PUBLIC SCHOOL DISTRICT,**

MARY SKIPPER, in her official capacity as Superintendent,
JEFFREY C. RILEY, in his official capacity
as Superintendent,

STAMFORD PUBLIC SCHOOL DISTRICT,

DR. TAMU LUCERO, in her official capacity
as Superintendent,

CHICAGO PUBLIC SCHOOL DISTRICT,

JOSE M. TORRES, PhD, in his official capacity as
Superintendent,

LOUDOUN COUNTY PUBLIC SCHOOL DISTRICT,

SCOTT A. ZIEGLER, in his official capacity as
Superintendent,

CAMDEN CITY PUBLIC SCHOOL DISTRICT,

KATRINA McCOMBS, in her official capacity as
Superintendent,

LOS ANGELES UNIFIED SCHOOL DISTRICT,

AUSTIN BEUTNER, in his official capacity as
Superintendent,

SAN DIEGO UNIFIED SCHOOL DISTRICT,

DR. LAMONT A. JACKSON, in his official capacity as
Superintendent, and

CINDY MARTEN, in her official capacity as former

Superintendent,
WAKE COUNTY PUBLIC SCHOOL DISTRICT,
CATHY QUIROZ MOORE, in her official capacity as
Superintendent,
AUSTIN INDEPENDENT PUBLIC SCHOOL DISTRICT,
STEPHANIE S. ELIZALDE, in her official capacity as
Superintendent,

Defendants.

**SOMERVILLE PUBLIC SCHOOL DISTRICT AND MARY SKIPPER'S MOTION TO
DISMISS**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendants Somerville Public Schools and Superintendent Mary Skipper collectively, Somerville Defendants move this Court to dismiss Plaintiff's claims against them.

Accordingly, Somerville Defendants respectfully request, for the reasons set forth above and those set forth in their accompanying Memorandum in support of this motion, that this Court grant this motion, dismiss all of Plaintiff's claims against them, and grant such further relief as is just and proper.

Respectfully submitted,

SOMERVILLE PUBLIC SCHOOL DISTRICT
AND MARY SKIPPER, IN HER OFFICIAL
CAPACITY AS SUPERINTENDENT

By their attorneys,

/s/Joshua R. Coleman

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June 30, 2022

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document, filed through the Electronic Case Filing System, will be served electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies shall be served upon those indicated as non-registered participants on June 30, 2022.

/s/ Joshua R. Coleman

Joshua R. Coleman